



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

201-15531

JUN 30 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Heinz Imhof
Chairman
Syngenta
2200 Concord Pike
Wilmington, DE 19803-2909

Dear Mr. Imhof:

I am responding to a letter dated March 4, 1999, from Mr. A. Keith Willard, then Zeneca's Chairman, to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to the request. I have enclosed a copy of his letter for your information.

That letter states that Zeneca no longer manufactures or imports the 20 chemicals listed below which were initially reported under the 1990 Inventory Update Rule (IUR) reporting period. Those chemicals were:

<u>CAS No.</u>	<u>Chemical</u>
26377-29-7	Sodium dimethyl dithioic acid
75-44-5	Carbonic Dichloride
98-11-3	Benzene sulfonic acid
118-29-6	2-(Hydroxymethyl)-1H-Isoindole-1,3-(2H-Dione
122-52-1	Phosphorous Acid, triethyl ester
141-52-6	Ethanol Sodium salt
882-33-7	Diphenyl disulfide
930-69-8	Benzenethiol, sodium salt
1497-68-3	phosphonochloridothioc acid, ethyl-o-ethyl ester
17564-64-6	2-Chloromethyl)-1H-Isoindole-1,3(2H)-dione
719-32-4	1,4-Benzenedicarbonyl dichloride, 2,3,5,6-tetrachloro(Tetrachloroterephthaloyl dichloride
1333-86-4	Carbon Black
84-65-1	Anthraquinone
121-57-3	Sulphanlic acid
121-45-9	Phosphorous Acid, trimethyl ester
98-09-9	Benzene Sulfonyl chloride

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<u>CAS No.</u>	<u>Chemical</u>
298-06-6	Diethylphosphorodithioic acid
756-80-9	Phosphorodithioic acid,o,o-dimethyl ester
4098-71-9	Cyclohexane,5-isocyanate-1-(Isocyanaiomethyl)1,3,3-Trimethyl
6473-13-8	C.I.Direct Black 22

The Agency has received several letters from companies stating that they no longer manufacture or import HPV chemicals for which they filed reports under the 1990 IUR and which are consequently included on the HPV Challenge Program Chemical List. The Agency will post all such letters on the Chemical Right-to-Know (ChemRTK) website (www.epa.gov/chemrtk) so that the general public and other interested stakeholders may see that a specific company is no longer associated with the manufacture or importation of a specific chemical.

The letter from Zeneca also stated that three chemicals

107-56-2	Isopropyl dithio acid
13889-92-4	Propyl chlorothioformate
52836-31-4	2,2,5-Trimethyl-3(dichloroacetyl)1,3-oxazolidine

no longer appear to be within the scope of the HPV Challenge. As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its ChemRTK website (www.epa.gov/chemrtk) in March 1999. Based on our review of the most up-to-date Inventory Update Rule (IUR) reporting for years 1998 and 2002, EPA has determined that these three chemicals **do meet** the "no longer HPV" criteria. The HPV Challenge Program Chemical List will be annotated by designating these three chemicals with a "5" to indicate that they are no longer HPV.

We will post Zeneca's letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsc hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201

Enclosure